

EXHIBIT A

IN THE STATE COURT OF BARROW COUNTY
STATE OF GEORGIA

FILED IN OFFICE
CLERK OF STATE COURT
BARROW COUNTY, GEORGIA

21-SV-000076
ROBERT M. GARDNER JR.
AUG 04, 2021 01:09 PM

  
Janie Jones, Clerk
Barrow County, Georgia

MARIE DORISCAR

Plaintiff,

v.

BENEFIT TRUCKING, INC,
CAROLINA CASUALTY INSURANCE
COMPANY and SHAIN FORD

Defendants.

Civil Action File No. _____

JURY TRIAL DEMANDED

COMPLAINT

COMES NOW plaintiff and files her complaint as follows:

1.

Plaintiff resides within Georgia and is subject to the jurisdiction of this Court.

2.

Defendant Shain Ford ("Ford") resides at 303 S Paul Street, Springfield, Sangamon County, Illinois 62703.

3.

Defendant Ford has been properly served with plaintiff's complaint.

4.

Jurisdiction and venue are proper in this Court for Defendant Ford.

5.

Defendant Benefit Trucking, Inc. ("Benefit"), a domestic corporation existing under the laws of the State of Illinois with its principal place of business in the State of Illinois, does not maintain a registered agent for service in the State of Georgia. Benefit may be served pursuant to O.C.G.A. § 14-2-1510(b) and O.C.G.A. § 9-11-4(e)(2) by delivering via certified U.S. Mail second originals of the summons and complaint upon Defendant Benefit Trucking, Inc. registered agent Henrika Bach, 818 W Hinsdale Ave, Hinsdale, Illinois 60521; and with a copy of process served upon the Georgia Secretary of State at 214 State Capitol, Atlanta, Georgia 30334 with the \$10.00 filing fee and the Affidavit of Counsel to be appended to the pleadings.

Defendant Benefit is subject to the jurisdiction of this court pursuant to O.C.G.A. § 14-11-108 and 40-1-117(b) in that the collision occurred in Barrow County, Georgia.

6.

On or about September 6, 2019, Plaintiff was traveling north on State Route 211.

7.

At the same time, Defendant Ford was traveling south on State Route 211 and made a left turn onto Interstate 85.

8.

Defendant Ford failed to confirm that the roadway was clear and collided with plaintiff's vehicle.

9.

The collision was caused by the fault of Defendant Ford.

10.

The collision was in no way caused by the plaintiff.

11.

As a result of the collision, plaintiff was injured.

12.

Defendant Ford is liable to plaintiff for his injuries and damages due to the negligent operation of his vehicle.

13.

Defendant Ford was in the scope and course of his employment with Benefit Trucking, Inc. at the time of subject collision.

14.

Defendant Benefit was at the time of the collision a motor contract carrier.

15.

Defendant Benefit was at the time of the collision a motor contract carrier as set forth by Georgia and Federal laws.

16.

Defendant Benefit is liable to plaintiff for her injuries and damages under the doctrine of respondeat superior.

17.

Defendant Carolina Casualty Insurance Company, (hereinafter "Carolina") was the liability insurer for Benefit Trucking, Inc.

18.

Defendant Carolina is a foreign corporation whose agent for service is CT Corporation at 289 S. Culver Street, Lawrenceville, Gwinnett County, Georgia 30046.

19.

Defendant Carolina is liable to Plaintiff as insurer for Defendant Ford and Defendant Benefit to the extent of its policy limits in the event of a judgment for plaintiff.

20.

The accident was not in any way caused by any third-party person or entity.

21.

Defendant Benefit was at the time of the accident an intrastate or interstate motor carrier.

22.

Defendant Benefit and Defendant Carolina are subject to filing requirements outlined in O.C.G.A § 40-2-140.

23.

Defendant Carolina is subject to a direct action as insurer to Benefit pursuant to O.C.G.A § 40-2-140.

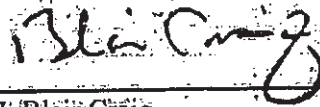
WHEREFORE, plaintiff prays for trial on all issues and judgment against defendant as follows:

- a. That plaintiff recover medical expenses and lost wages in an amount to be proven at trial;
- b. That plaintiff recover for pain and suffering in an amount to be determined by the jury;
- c. That plaintiff recover such other and further relief as is just and proper; and
- d. That all issues be tried before a jury.

[Signature to Follow on Next Page]

This 4th day of August, 2021.

WOOD CRAIG & AVERY, LLC

A handwritten signature in dark ink, appearing to read "Blair Craig", is written over a horizontal line.

J. Blair Craig
Georgia Bar No. 192850
Attorney for Plaintiff

3520 Piedmont Road, NE
Suite 280
Atlanta, GA 30305
P: (404) 888-9962
F: (470) 552-3648
blair@woodcraig.com